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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

D-1 ERIC DOWDY,
D-2 ROBERT DARCY,
D-3 JIMMY GARCIA,
D-4 FERNANDO SAENZ,
D-5 EDWARD ABDELLA,
D-6 ANDREW ALLISON,
D-7 GAHAD EL-ZAYAT

Defendants.

Case:2:17-cr-20024

Judge: Edmunds, Nancy G.

MJ: Majzoub, Mona K.

Filed: 01-12-2017 At 04:41 PM

INDI USA V. DOWDY ET AL (NA)

Violations:

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)
CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE AND
DISTRIBUTION OF A CONTROLLED SUBSTANCE
(METHAMPHETAMINE)**

D-1 ERIC DOWDY
D-2 ROBERT DARCY
D-3 JIMMY GARCIA
D-4 FERNANDO SAENZ
D-5 EDWARD ABDELLA
D-6 ANDREW ALLISON
D-7 GAHAD EL-ZAYAT

From on or about December 1, 2015, to on or about December 15, 2016, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendants, ERIC DOWDY, ROBERT DARCY, JIMMY GARCIA, FERNANDO SAENZ, EDWARD ABDELLA, ANDREW ALLISON and GAHAD EL-ZAYAT, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other individuals, both known and unknown to the Grand Jury, to distribute a controlled substance, to wit: 50 grams or more of methamphetamine, its salts, isomers and salts of its isomers.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT TWO

**18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(h) -
CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS**

D-1 ERIC DOWDY
D-2 ROBERT DARCY
D-3 JIMMY GARCIA
D-4 FERNANDO SAENZ
D-5 EDWARD ABDELLA
D-6 ANDREW ALLISON
D-7 GAHAD EL-ZAYAT

From on or about December 1, 2015, to on or about December 15, 2016, in the Eastern District of Michigan, Southern Division, and elsewhere, defendants, ERIC DOWDY, ROBERT DARCY, JIMMY GARCIA, FERNANDO SAENZ,

EDWARD ABDELLA, ANDREW ALLISON and GAHAD EL-ZAYAT, knowing that the property involved represented the proceeds of some form of unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(1), that is, the conspiracy to possess with the intent to distribute and distribution of methamphetamine, a felony under Title 21, United States Code, Section 846, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with each other, and with others, both known and unknown to the grand jury, to conduct and cause to be conducted financial transactions which involved the proceeds of said unlawful activity, with intent to promote the carrying on of said unlawful activity, and to conceal and disguise the nature, location, source, ownership and control of the proceeds of the said unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), and (h).

COUNT THREE

**21 U.S.C. § 841(a)(1) - POSSESSION WITH INTENT TO DISTRIBUTE A
CONTROLLED SUBSTANCE (METHAMPHETAMINE)**

D-6 ANDREW ALLISON

On or about September 1, 2016, in the Eastern District of Michigan, Southern Division, the defendant, ANDREW ALLISON, did knowingly and intentionally

possess with intent to distribute a controlled substance, to wit: 50 grams or more of methamphetamine, its salts, isomers and salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A).

COUNT FOUR

21 U.S.C. § 841(a)(1) - POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE (METHAMPHETAMINE)

D-7 GAHAD EL-ZAYAT

On or about October 12, 2016, in the Eastern District of Michigan, Southern Division, the defendant, GAHAD EL-ZAYAT, did knowingly and intentionally possess with intent to distribute a controlled substance, to wit: 5 grams or more of methamphetamine, its salts, isomers and salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B).

COUNT FIVE

21 U.S.C. § 841(a)(1) - POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCES (METHAMPHETAMINE AND GAMMA HYDROXYBUTYRIC ACID)

D-5 EDWARD ABDELLA

On or about August 30, 2016, in the Eastern District of Michigan, Southern Division, the defendant, EDWARD ABDELLA, did knowingly and intentionally

possess with intent to distribute a controlled substance, to wit: methamphetamine, its salts, isomers and salts of its isomers and gamma hydroxybutyric acid.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

GENERAL FORFEITURE ALLEGATIONS

21 U.S.C. § 853, 18 U.S.C. § 982(a) – CRIMINAL FORFEITURE

1. The allegations set forth above in this Indictment are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture against each of the defendants pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a).

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the controlled substance offenses in violation of Title 21, as alleged in this Indictment, the convicted defendant(s) shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s).

3. Upon conviction of violating Title 18, United States Code, Section 1956(h), as alleged in this Indictment, the convicted defendant(s) shall forfeit to the United States: (a) any property, real or personal, involved in such offense, or any

property traceable to such property, and (b) any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 982(a)(1).

4. **Substitute Assets:** If the property described above as being subject to forfeiture, as a result of any act of a defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. 853(p) as incorporated by 18 U.S.C. 982(b), to seek to forfeit any property of such defendant up to the value of the forfeitable property described above.

5. **Money Judgment:** Upon conviction of one or more violations alleged in this Indictment, the United States will seek a forfeiture money judgment against the convicted defendants in an amount representing the total amount of proceeds obtained as a result of the aforementioned offenses, and/or the total amount involved in the violations of Title 21, United States Code, Sections 841 and 846, and Title 18, United States Code, Section 1956(h), for which the convicted defendants shall be

jointly and severally liable.

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. MCQUADE
United States Attorney

s/Rajesh Prasad
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Dated: January 12, 2017

Case:2:17-cr-20024

Judge: Edmunds, Nancy G.

MJ: Majzoub, Mona K.

Filed: 01-12-2017 At 04:41 PM

INDI USA V. DOWDY ET AL (NA)

United States District Court
Eastern District of Michigan**Criminal Case Cov**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>RP</i>

Case Title: USA v. Eric Dowdy et al.County where offense occurred : Wayne County and elsewhereCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 16-mj-30563; 30442]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

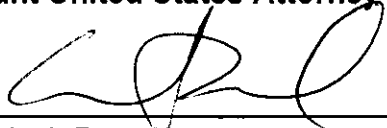
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 12, 2017

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.